

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

REGINALD BROWN,

Plaintiff,

vs.

CASE NO.:

SELIG ENTERPRISES, INC.,

Defendant.

_____ /

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, **REGINALD BROWN** (“Plaintiff”), by and through undersigned counsel, hereby file this Complaint against Defendant, **SELIG ENTERPRISES, INC.**, (“Defendant”) and in support thereof states as follows:

INTRODUCTION

This is an action brought pursuant to the Civil Rights Act of 1866, 42 U.S.C. §1981 (“Section 1981”) for discrimination, and seeks to recover back pay, front pay, compensatory damages, damages for mental anguish and emotional distress, pain and suffering, punitive damages, injunctive relief, equitable relief, reasonable attorneys’ fees and costs and any other relief to which the Plaintiff is entitled.

JURISDICTION AND VENUE

1. The Court has jurisdiction over Plaintiffs' claims pursuant to 28 U.S.C. §1331.
2. This Court has jurisdiction over Plaintiffs' claims because, at all times material to this Complaint, the unlawful employment conduct complained of and the resultant injury occurred within the judicial district in and for Fulton County, Georgia.
3. Specifically, Plaintiff was employed by Defendant who lists its principal office address as 1100 Sprint Street NW, Suite 500, Atlanta, Georgia 30309-2857. See Georgia Division of Corporation website at www.ecorp.sos.ga.gov

PARTIES

4. Plaintiff is an African American male.
5. Plaintiff is a citizen of the United States of America and is subject to the jurisdiction of this Court.
6. At all times relevant to this Complaint, Defendant was qualified to do business in Georgia, and at all times material hereto has conducted business within this District.
7. Defendant may be served with process by delivering a copy of the Summons and Complaint to its Registered Agent, Kenneth J. Clayman, at 1100 Spring Street NW, Suite 550, Atlanta, Georgia 30309.

8. Defendant is now and, at all times relevant hereto, has been a for-profit corporation.

9. Defendant is engaged in an industry affecting commerce employing more than fifty (50) employees.

FACTUAL ALLEGATIONS

10. According to its website, Defendant is a family-owned and operated real estate company that has a portfolio of more than 15 million square feet of retail, industrial, mixed-used and office properties throughout the Southeast. Defendant has been involved in major developments in Midtown and Downtown Atlanta. See www.SeligEnterprises.com/About/Mission

11. Plaintiff is an African-American male.

12. Plaintiff began working for Defendant in or about January 1994 as an Operations Manager in the Atlanta area.

13. In approximately 1995, Plaintiff was relocated to Orlando Florida where he was promoted to Regional Manager/Regional VP of Florida operations.

14. Plaintiff was then relocated to Atlanta in 2005 where he was in charge of operations for Marriott Suites of Midtown.

15. In October of 2019, the President of Defendant, Ron Williams, retired and was replaced by Kris Bowen.

16. It should be noted that under Mr. Williams' tenure as President, Plaintiff had no disciplinary write-ups or counseling within the company.

17. On or about March 23, 2020, Plaintiff was contacted by Director of Operations, Pay Wallace, to stop by the corporate office after his shift.

18. During that meeting, Plaintiff was presented a furlough letter signed by VP of Human Resources, Ericka Bryan.

19. Plaintiff was furlough due to the Coronavirus pandemic.

20. Plaintiff was the only African American in a managerial position that was furloughed.

21. President of Defendant, Kris Bowen, explained to Plaintiff that when business picked up, Plaintiff would be brought back to the company.

22. However, in May of 2020, Plaintiff received a separation/termination letter from Defendant.

23. To date, Plaintiff has not been offered employment even though business has picked up.

24. Defendant terminated Plaintiff based on his race in violation of Section 1981

**COUNT I - DISCRIMINATION BASED ON RACE
IN VIOLATION OF SECTION 1981**

25. Plaintiff re-alleges and adopts paragraphs 1-24 as though set forth fully herein.

26. Plaintiff is a member of a protected class under Section 1981 due to his race.

27. By the conduct described above, Defendant engaged in unlawful employment practices and discriminated against Plaintiff on the basis of his race in violation of Section 1981.

28. Defendant knew or should have known of the discrimination.

29. The above discrimination was done by Defendant with a reckless disregard for Plaintiff's rights under federal law. As a direct and proximate result of the discrimination described above, Plaintiff has suffered and continues to suffer mental anguish, distress, humiliation and loss of enjoyment of life.

WHEREFORE, Plaintiff prays for a trial by jury and all legal and equitable relief allowed by law including:

- a. Compensatory damages for emotional pain and suffering;
- b. Injunctive relief;
- c. Prejudgment interest;
- d. Punitive damages;
- e. Costs and attorney's fees; and,
- f. Such other relief as the Court may deem just and proper.

JURY DEMAND

Plaintiff requests that upon trial of this action all issues be submitted to and determined by a jury except those issues expressly reserved by law for determination by the Court.

Dated this _____ day of July, 2021.

Respectfully submitted,

Jeremy Stephens, Esq.
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